

REMARKS

This application has been carefully reviewed in light of the Office Action dated April 20, 2006. Claims 1 to 12, 19 to 25 and 29 to 35 remain pending in the application, of which Claims 1, 9, 12, 19, 29, 32 and 34 are independent. Reconsideration and further examination are respectfully requested.

Claims 19 to 25, 29 to 31, 34 and 35 were rejected under 35 U.S.C. § 112, first paragraph. Specifically, the Office Action contends that the claims are not enabled and lack support in the specification. The rejections are respectfully traversed.

With regard to the rejections for alleged lack of enablement, Applicant respectfully submits that one of ordinary skill in the art simply knows how to make and use the claimed invention without undue experimentation. Computer programs and their execution by computer has been very well known in the art for decades. Therefore, the assertion that the disclosure is not enabling is simply not well taken. Moreover, the Office Action does not provide any evidence or reasons to the contrary, and therefore does not meet its burden of establishing a *prima facie* case of non-enablement. (See MPEP § 2164.04 ("The language [of the rejection] should focus on those factors, reasons, and evidence that lead the examiner to conclude that the specification fails to teach how to make and use the claimed invention without undue experimentation") (emphasis in original)). Nonetheless, the claims have been clarified as requested in the Office Action. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Turning now to the rejections for alleged lack of written description, the Office Action contends that the specification does not disclose a "computer readable medium as claimed." (Office Action, page 3). However, Applicants submit that at least

Figures 1 to 4 support the claimed medium. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

Claims 19 to 25, 29 to 31, 34 and 35 were rejected under 35 U.S.C. § 101. Specifically, the Office Action contends that the claimed "[c]omputer executable process steps stored on a computer-readable medium" are non-statutory. (Office Action, pages 3 and 4). The rejections are respectfully traversed.

As the MPEP explains, "a claimed computer-readable medium encoded with a computer program is a computer element which defines structural and functional interrelationships between the computer program and the rest of the computer which permit the computer program's functionality to be realized, and is thus statutory." (MPEP § 2106(TV)(B)(1)(a)). Therefore, the rejections are simply not understood and are not well taken. As such, reconsideration and withdrawal of the rejections are respectfully requested.

Claims 1, 7 to 9, 12, 19, 24, 25, 29, 32 and 34 were rejected under 35 U.S.C. § 103(a) U.S. Patent No. 6,321,127 (Crawley) in view of U.S. Patent No. 6,175,866 (Holloway), and Claims 2 to 6, 10, 11, 20 to 23, 30, 31, 33 and 35 were rejected under 35 U.S.C. § 103(a) over Crawley in view of Holloway and further in view of U.S. Patent No. 6,366,913 (Fitler). The rejections are respectfully traversed.

Referring specifically to the claims, Claim 1 is a method for multicasting changes made in a directory server which contains information within a directory and makes a change to the information in the directory in accordance with a directory change operation, comprising the steps of establishing plural multicast groups, each multicast group corresponding to a respective change category for a type of change made to the directory in the directory server, and submitting change information responsive to a change being made to the directory in the directory server, the change information being submitted

to each member which belongs to a selected one of the plural multicast groups corresponding to the change category for the type of change made to the directory in the directory server.

Independent Claims 32 and 34 are method and computer-executable process steps claims, respectively, that are along the lines of Claim 1, but which are more specifically directed to a method for providing notification of changes made in a directory server which contains information in a directory and which makes a change to the information in the directory in accordance with a directory change operation, comprising the steps of establishing plural groups each corresponding to a respective change category for a type of change made to the directory in the directory server, and in response to a change being made to the directory in the directory server, providing notification of the change to each member which belongs to a selected one of the plural groups that corresponds to the change category for the type of change made to the directory in the directory server.

Independent Claim 9 is a method for obtaining change information from a directory server which contains information within a directory and which makes a change to the information in the directory in accordance with a directory change operation, comprising the steps of registering as a member of at least one of a plurality of multicast groups, each of the plurality of multicast groups corresponding to a respective change category for a type of change made to the directory in the directory server, and receiving from the directory server, change information submitted to each member which belongs to the multicast group corresponding to the change category for the type of change made to the directory in the directory server.

Independent Claim 29 is a computer-executable process steps claim that corresponds generally to Claim 9.

Independent Claim 12 is an apparatus for multicasting changes made in a directory server which contains information within a directory and which makes a change to the information in the directory in accordance with a directory change operation, wherein plural multicast groups are established such that each multicast group corresponds to a respective change category for a type of change made to the directory in the directory server, comprising a processor for executing executable process steps, and a memory medium storing executable process steps, wherein the executable process steps comprise (a) generating change information responsive to a change being made to the directory in the directory server, wherein the change information corresponds to the type of change made to the directory, and (b) submitting the change information to each member which belongs to a selected one of the plural multicast groups corresponding to the change category for the type of change made to the directory in the directory server.

Independent Claim 19 is a computer-executable process steps claim that corresponds generally to Claim 12.

The applied references, alone or in any permissible combination, are not seen to disclose or to suggest the features of the present invention. Specifically, the applied references are not seen to disclose or to suggest at least the feature of establishing plural groups/multicast groups each corresponding to a respective type of change category for a type of change made to a directory server, and when a change is made to a directory of the directory server, submitting change information to each member which belongs to one of the plural groups/multicast groups corresponding to the change category for the type of change made to the directory.

Along the same lines, the applied references are not seen to disclose or to suggest registering as a member of at least one of a plurality of multicast groups, each of which corresponding to a respective change category for a type of change made to a directory in a directory server, and the registered member receiving change information submitted to each member which belongs to the multicast group corresponding to the change category for the type of change made to the directory in the directory server.

The Office Action concedes that Crawley fails to disclose each multicast group corresponding to a respective change category for a type of change made to the directory in the directory server. However, the Office Action asserts that Holloway discloses this feature. Specifically, the Office Action asserts that Holloway teaches "defining a group of network devices based on a network parameter, wherein a change in the network parameter of one member in the group causes a notification be sent to the remaining group members." (Office Action, page 6).

Applicant respectfully disagrees with the Office Action's characterization of Holloway. In particular, Holloway is not seen to disclose that a "a change in the network parameter of one member in the group causes a notification be sent to the remaining members." Rather, Holloway expressly discloses that the "constructed group monitor can thereafter be monitored for indications of changes in any of the grouped network parameters." (column 2, lines 38 to 40 of Holloway; See also column 18, lines 27 to 59 (describing the specific inquiry process for sending "an inquiry as to whether the group has changed subsequent to a last inquiry"))).

Nonetheless, the Office Action's characterization of Holloway still fails to disclose the features of the present invention. Specifically, the Office Action's characterization of Holloway "defining a group of network devices based on a network

parameter, wherein a change in the network parameter of one member in the group causes a notification be sent to the remaining members” is not seen to disclose or to suggest a feature of each multicast group corresponding to a respective change category for a particular type of change made to the directory in the directory server. A group of network devices having a common network parameter that can be changed is simply different from a multicast group corresponding to a respective change category for a type of change made to a directory in a directory server.

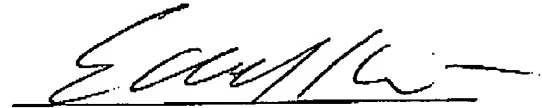
The remaining reference, namely Fitler, is not seen to cure the deficiencies of Crawley and Holloway, either alone or in any permissible combination. Accordingly, independent Claims 1, 9, 12, 19, 29, 32 and 34 are believed to be allowable.

The other claims in the application are dependent from the independent claims discussed above and therefore are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing amendment and remarks, the entire application is believed to be in the condition for allowance and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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